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February 3, 2025

VIA ECF/PACER

The Honorable Magistrate Judge Leda Dunn Wettre
United States District Court District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

RE: Clay Velazquez v. CITGO Petroleum Corporation, et. al.
Case No.: 2:17-cv-05958
Our File No.: 01136-00109206-NY042

Dear Judge Wettre:

I represent CITGO Petroleum Corporation in the above-referenced matter. Please accept this letter, with the consent of plaintiff's counsel, as our proposed discovery order for Your Honor's consideration.

- Plaintiff's deposition on or before 4/15/25
- Depositions of all other fact witnesses, including defense witnesses, on or before 5/1/25
- Plaintiff to serve all liability and medical expert reports on or before 6/30/25
- Plaintiff to serve all vocational expert reports, economic loss expert reports, and/or life care plan reports on or before 6/30/25
- Defendant to serve all medical expert, vocational rehab expert reports, economic loss expert reports, and/or life care plan reports on or before 7/31/25
- Settlement conference on August _____, 2025

Respectfully yours,

CIPRIANI & WERNER, P.C.

Michael D. Noblett
MICHAEL D. NOBLETT, ESQ.
Attorneys for Defendants:
CITGO Petroleum Corporation

MDN:jmm

cc: Nicholas P. Scutari, Esq. (via ECF/PACER)